

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PARAMOUNT RESIDENTIAL
MORTGAGE GROUP, INC.,

Plaintiff - Counterclaim Defendant,

V.

NATIONWIDE MORTGAGE
BANKERS, INC.,

Defendant - Counterclaim Plaintiff.

CIVIL ACTION

Case No. 3:22-cv-04656

**PLAINTIFF – COUNTERCLAIM DEFENDANT
PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC.’S
NOTICE OF MOTION TO DISMISS SECOND AMENDED COUNTERCLAIMS**

PLEASE TAKE NOTICE that in accordance with the Court’s Order dated September 19, 2023 (ECF No. 41), Plaintiff – Counterclaim Defendant Paramount Residential Mortgage Group, Inc. (“PRMG”) moves this Court pursuant the authority of Local Rules 7.1 and 78.1, in Courtroom 4W of the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, on November 6, 2023, or as soon thereafter as the Court permits, or by telepresence if so Ordered, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure to dismiss with prejudice the Second Amended Counterclaims of Defendant Nationwide Mortgage Bankers, Inc. (“NMB”) (ECF No. 35). The motion is based upon this Notice of Motion, the accompanying Memorandum of Law in Support of the Motion, the Response in Opposition to the Motion, and such further argument and matters as may be offered. A proposed form of Order is being submitted with this Motion. Pursuant to Local Rule 78.1(b), PRMG respectfully requests oral argument on the Motion.

Respectfully submitted by:

Date: October 13, 2023

/s/ Brent A. Cossrow
FISHER & PHILLIPS LLP

BRENT A. COSSROW, ESQUIRE
EDWARD G. WINSMAN, ESQUIRE
Two Logan Square, 12th Floor
100 N. 18th Street
Philadelphia, PA 19103
Telephone: (610) 230-2150
Fax: (610) 230-2151
bcossrow@fisherphillips.com
ewinsman@fisherphillips.com

*Attorneys for Plaintiff – Counterclaim Defendant
Paramount Residential Mortgage Group, Inc.*